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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

United States of America,

Plaintiff,

v.

Michael Lacey, et al.,

Defendants.

No. CR-18-422-PHX-SMB

**UNITED STATES' MOTION TO
EXTEND TIME FOR FILING ITS
RESPONSE (Doc. 531)**

The United States moves for an unopposed extension of time to file its response to Defendant Spears' Motion for Immediate Discovery Regarding Government's Abuse of Grand Jury and Trial Subpoenas to Obtain Defense Lawyer Bank Accounts and for Potential Sanctions. (Doc. 531.) The current deadline is May 1, 2019. The United States'

1 requests the deadline be extended one week, to May 8, 2019. Counsel for the United States
2 has conferred with Defendant Spear's counsel—Bruce Feder—who indicated he has no
3 objection to this brief extension.

4 Excludable delay under 18 U.S.C. § 3161(h) may occur as a result of this motion or
5 an order based thereon.

6 Respectfully submitted this 25th day of April, 2019.

7 ELIZABETH A. STRANGE
8 First Assistant United States Attorney
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9 *s/ Kevin Rapp*

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CERTIFICATE OF SERVICE

I hereby certify that on this date, April 25, 2019, I transmitted the foregoing under-seal document for filing to the Clerk of the United States District Court and sent a copy via electronic mail to: Paul J. Cambria Jr. Esq. and Erin e. McCampbell, Esq., Lipsitz Green Scime Cambria, LLC, 42 Delaware Ave, Suite 120, Buffalo, NY 14202, **pcambria@lglaw.com** and **emccampbell@lglaw.com**, Thomas H. Bienert, Jr., Esq., Anthony R. Bisconti, Esq., Kenneth M. Miller, Esq., and Whitney Bernstein, Esq., Bienart, Miller & Katzman, PLC, 903 Calle Amanecer, Suite 350, San Clemente, CA 92673, **tbienert@bmkattorneys.com**, **tbisconti@bmkattorneys.com**, **kmiller@bmkattorneys.com**, **wbernstein@bmkattorneys.com**; Mike Piccarreta, Esq., Piccarreta Davis Keenan Fidel, PC, 2 East Congress Street, Suite 1000, Tucson, AZ 85701, **mlp@pd-law.com**; Jim Grant Esq., Davis Wright Termaine, LLP, 1201 Third Avenue, Suite 2200, Seattle, WA 98101, **jimgrant@dwt.com**; Michael D. Kimerer, Esq. and Rhonda Elaine Neff, Esq., 1313 E. Osborn Road, Suite 100, Phoenix, AZ 85014, **MDK@kimerer.com** and **rneff@kimerer.com**; Steve Weiss Esq., Karp & Weiss, PC, 3060 North Swan Rd., Tucson, AZ 85712, **sweiss@karpweiss.com**; Robert Corn-Revere Esq., Davis Wright Termaine, LLP, 1919 Pennsylvania Avenue N.W., Suite 800, Washington, D.C., 20006, **bobcornrevere@dwt.com**; Bruce Feder, Esq., 2930 East Camelback Road, Suite 160, Phoenix, AZ 85016, **bf@federlawpa.com**; Gary Linenberg, Esq., Ariel Neuman, Esq., Gopi K. Panchapakesan, Esq., Bird, Marella, Boxer, Wolpert, Nessim, Drooks, Lincenberg & Rhow, P.C., 1875 Century Park East, 23rd Floor, Los Angeles, CA 90067, **glincenberg@birdmarella.com**, **aan@birdmarella.com**, **gkp@birdmarella.com**.

s/ Angela Schuetta
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U.S. Attorney's Office

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8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE DISTRICT OF ARIZONA

10 United States of America,

No. CR-18-422-PHX-SMB

11 Plaintiff,

ORDER

12 v.

13 Michael Lacey, et al.,

14 Defendants.
15

16 Based on the United States' Motion to Extend Time for Filing Its Response, and
17 good cause appearing,

18 **IT IS HEREBY ORDERED** granting the United States' motion and extending the
19 deadline for it to respond to Defendant Spears' Motion for Immediate Discovery Regarding
20 Government's Abuse of Grand Jury and Trial Subpoenas to Obtain Defense Lawyer Bank
21 Accounts and for Potential Sanctions (doc. 531) to May 8, 2019.

22 **IT IS FURTHER ORDERED** that excludable delay under 18 U.S.C. § 3161(h) is
23 found to commence from _____ through _____.
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